



AMERICAN FARM BUREAU FEDERATION®

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December 20, 2004

Division of Dockets Management
Food and Drug Administration
5630 Fishers Lane, Room 1061
Rockville, Maryland 20852

Docket Nos. 1996P-0418, 1997P-0197, 1998P-0203, and 2000N-0504

Dear Sir or Madam:

The American Farm Bureau Federation (AFBF) is concerned about the Food and Drug Administration's proposed rule on *Salmonella* Enteritidis (SE) in shell eggs and specifically on-farm regulations that seem overly burdensome. AFBF has many members that produce eggs. They have always taken great pride in delivering a safe product to their customers.

Egg producers are already regulated by many different state and federal agencies. It appears that the Food and Drug Administration (FDA) is requiring numerous prevention measures for SE without recognizing existing state and industry efforts.

Many egg producers comply with industry quality assurance programs to produce the safest food product. It would seem prudent to recognize these producers as being in compliance with the FDA rule.

The Agricultural Marketing Service (AMS) already inspects egg packing facilities four times a year under the Shell Egg Surveillance Program, often in cooperation with state agencies. Farm Bureau believes that AMS could better handle inspection and enforcement of some of these issues since that agency already operates the surveillance program and enforces the Food Safety Inspection Service's (FSIS) refrigeration requirements for eggs packed for consumers.

FDA's rule would require implementation of a biosecurity program, which includes limitation of visitors, cleaning of equipment, hygiene of workers, moving between layer houses, security against wild birds and animals and prohibitions against employees having backyard flocks. Biosecurity is important, but these rules should be more flexible, especially for smaller farms who may have difficulty in complying with these prescriptive rules.

In the rule, FDA makes numerous requirements on producers such as rodent and pest control programs, storage controls, procurement of chicks and pullets and cleaning/disinfecting protocols. The market demands safe, high-quality products, and producers already are complying with numerous regulations prescribed by federal and state authorities that address many of the same issues in the FDA rule. AFBF urges the FDA to revise the proposed regulation making it more flexible, reasonable to apply and scientifically based regarding *Salmonella* Enteritidis.

Sincerely,


Bob Stallman
President

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